

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

THE UNITED STATES OF AMERICA

vs.

CHRISTOPHER D. CASACCI,
d/b/a Exotic Cubs.com,

Defendant.

**DECLARATION IN SUPPORT
OF MOTION TO EXTEND
TIME FOR DISCOVERY AND
PRETRIAL MOTIONS**

Docket No. 20-CR-5-A

NICHOLAS A. ROMANO, ESQ., under the penalty of perjury and pursuant to 29 U.S.C. § 1746, declares the following to be true and correct:

1. I am an attorney admitted to practice law in New York State and this Court. I am an associate with the law firm **CONNORS LLP**, attorneys for the defendant, **CHRISTOPHER D. CASACCI, D/B/A EXOTIC CUBS.COM**, in this action. As such, I am fully familiar with the pleadings and proceedings to date in this action.

2. I make this declaration in support of Mr. Casacci's respectful request for an Order of this Court extending his deadline for discovery and pretrial motions forty-five (45) days, together with such other and further relief as this Court deems just and proper.

3. The current deadline for filing pretrial motions is Tuesday, March 10, 2020. *See* Docket No. 5 (Scheduling Order, dated January 9, 2020). If the request for extension is granted, Mr. Casacci's motions would be due on or before Friday, April 24, 2020.

4. As part of the government's first discovery production on February 4, 2020, Mr. Casacci received over ten-thousand (10,000) pages, videos, audio recordings, and other materials from the government. Then on March 6, 2020, the government provided further discovery as part of its second discovery production, which included more documents, audio recordings, and other materials.

5. Mr. Casacci and the defense team have been diligently reviewing and analyzing those materials, but their review is not complete. The outcome of their review will have a direct impact on discovery and pretrial motions, if any, to be filed on his behalf.

6. Assistant United States Attorney Aaron J. Mango, Esq., and Department of Justice Trial Attorney Patrick M. Duggan, Esq., have been consulted regarding the status of pretrial motions, and the government has no objection to the extension of time.

7. Mr. Casacci expressly agrees that the requested additional forty-five days (45) for discovery and pretrial motions should be excluded from computation under the Speedy Trial Act, 18 U.S.C. § 3161(h).

8. Accordingly, Mr. Casacci respectfully requests an Order of this Court extending his deadline for discovery and pretrial motions for forty-five (45) days, together with such other and further relief as this Court deems just and proper.

Executed on: March 9, 2020

/s/Nicholas A. Romano
NICHOLAS A. ROMANO